

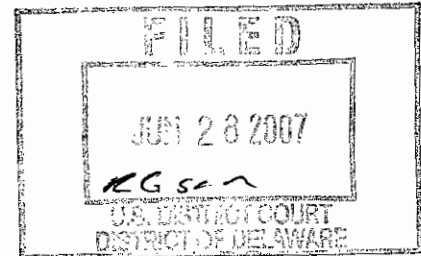
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WILLIAM FRANCIS, JR.
Plaintiff,

v.

C.A. No. 07-015-JJF

WARDEN THOMAS CARROLL,
CORRECTIONAL MEDICAL SERVICES,
STAN TAYLOR, and JOYCE TALLEY,
Defendants.



**AFFIDAVIT IN SUPPORT OF THE PLAINTIFF'S MOTION FOR THE
APPOINTMENT OF COUNSEL**

WILLIAM FRANCIS, JR., being duly sworn, deposes and says:

1. I am the plaintiff in the above entitled case. I make this affidavit in support of my motion for the appointment of counsel.
2. The complaint in this case alleges that the defendants have been deliberately indifferent and discriminatory toward plaintiff's need to receive full and adequate treatment for his chronic periodontal disease. He has been denied access to dental floss of any kind and access to a periodontist/orthodontist. Plaintiff's disease continues to advance and worsen and denial of the required treatment and specialized medial/dental care poses a significant and substantial threat to plaintiff's overall health and well-being.
3. The plaintiff has demanded a jury trial.

4. Plaintiff has extremely limited resources at this disposal; is unable to travel, to conduct investigations, interview/depose witnesses and experts, and is at an unfair disadvantage by not having access to free and modern means of communication and research (i.e. internet, e-mail, fax, cell phone and/or direct land line).
5. Plaintiff has not earned a law degree.
6. Plaintiff is uneducated and undereducated in the fields of dentistry, pathology and general medical practice.
7. The case involves medical and health issues that may require expert testimony.
8. The case will require substantial discovery of documents and depositions and subpoena of numerous witnesses.

WHEREFORE, the plaintiff's MOTION FOR THE APPOINTMENT OF COUNSEL should be granted.

I declare under penalty of perjury, pursuant to 28 U.S.C. Section 1746 and 18 U.S.C. Section 1621, that the foregoing is true and correct.

Signed this 27th day of June, 2007

William Francis, Jr.
William Francis, Jr., plaintiff, pro se
#264560
Delaware Correctional Center
1181 Paddock Road
Smyrna, DE 19977

Certificate of Service

I, William Francis, Jr. hereby certify that I have served a true and correct copy(ies) of the attached NOTICE OF AND MOTION FOR THE APPOINTMENT OF COUNSEL and AFFIDAVIT IN SUPPORT upon the following parties/persons:

To: Office of the Clerk

United States District Court

844 N. King Street, Lockbox 18

Wilmington, Delaware 19801-3570

To: Megan T. Mantzavinos, Esquire

Ryan M. Ernst, Esquire

913 Market Street, #800

Wilmington, DE 19801

To:

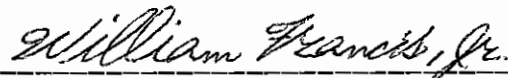
To:

To:

To:

BY PLACING IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correction Center, Smyrna, DE 19977.

On this 27th day of june, 2007



William Francis, Jr., plaintiff, pro se

SBI # 264560

WM William Francis, Jr.
SBI# 264560 UNIT W-D-22
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

U.S.M.S.
X-RAY

Office of the Clerk
U.S. District Court
844 N. King Street, Lockbox 18
Wilmington, Delaware
19801-3570

